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EXHIBIT 280

SHANI A. PINNEY 30(b)(6)
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

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1 UNITED STATES DISTRICT COURT FOR THE
2 SOUTHERN DISTRICT OF NEW YORK
3 CASE NUMBER: 22-CV-10904-JSR
4 ACTION FOR DAMAGES

5 GOVERNMENT OF THE UNITED STATES)
6 VIRGIN ISLANDS,)
7 Plaintiff,)
8 VS.)
9 JP MORGAN CHASE BANK, N.A.,)
10 Defendant.)
11 -----

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13

14

15 VIDEO RECORDED DEPOSITION OF

16 SHANI A. PINNEY

17 30(B)(6) WITNESS

18 TUESDAY, JULY 18, 2023

19

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21 REPORTED BY:

22 DENISE D. HARPER-FORDE
23 Certified Shorthand Reporter (CSR)
Certified RealTime Reporter (CRR)
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Notary Public (FLORIDA)

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1 Justice.

2 Q. Did any of the jobs you had
3 before working for DoJ involve law
4 enforcement?

5 A. No.

6 Q. Did they involve sex offender
7 monitoring in any way?

8 A. No.

9 Q. When did your employment with
10 DoJ begin?

11 A. In 2011, November 2011.

12 Q. What position did you have?

13 A. Sexual offender registry. I
14 believe it's now it was coordinator.

15 Q. And what were your roles and
16 responsibilities?

17 A. My role was for the St.
18 Thomas, St. John Jurisdiction to
19 register sexual offenders who were
20 living or working on the two
21 Islands.

22 Q. Anything else?

23 A. Paperwork. Updating the
24 online registry for the sexual
25 offenders to reflect their addresses,

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1 Ackerman. It was just myself and
2 Attorney Ackerman.

3 Q. So what was the reference you
4 just made to Attorney Carbon or Monica
5 Carbon?

6 A. So I understand that Attorney
7 Carbon met with Attorney Ackerman, and
8 her -- a brief review of -- of that
9 meeting was provided to me as well
10 too.

11 Q. Okay. So you never met with
12 Ms. Carbon, but a summary of that
13 meeting was provided to you?

14 A. That's correct.

15 Q. Okay. Do you have that
16 document with you today?

17 A. No, I don't.

18 Q. Does your Counsel?

19 ATTORNEY ACKERMAN: Yes, I
20 have it. I can provide it.

21 ATTORNEY O'LAUGHLIN: Okay.
22 Could you enter it as the first
23 exhibit please?

24 ATTORNEY ACKERMAN: Well -- so
25 I'm going to enter it into the

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1 ATTORNEY ACKERMAN: Okay.

2 (BY ATTORNEY O'LAUGHLIN):

3 Q. Is this the document that you
4 reviewed in preparation for your
5 testimony today?

6 A. Yes. I skimmed over this
7 yesterday evening.

8 Q. So the first time you saw this
9 document was yesterday evening?

10 A. Yes.

11 Q. And how did this document help
12 you prepare for your testimony
13 today?

14 ATTORNEY ACKERMAN: Object to
15 form.

16 THE WITNESS: How it helped me
17 to prepare for today? It
18 explained the beginning of how the
19 sexual offender registry statute
20 came to be. How it was -- how and
21 why it was improved here in the
22 Virgin Islands. And then --

23 ATTORNEY ACKERMAN: You can
24 scroll this document if you need
25 to.

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1 THE WITNESS: Thank you. And
2 then it also went on to explain,
3 you know, the -- in regards to
4 Jeffrey Epstein and his
5 classification and his
6 registration here in the Virgin
7 Islands.

8 (BY ATTORNEY O'LAUGHLIN):

9 Q. What is the sex offender
10 registry for?

11 A. The sex offender registry
12 board was a combination of
13 professionals here in the Virgin
14 Islands. And within the statute it
15 details that their duties are, you
16 know, to review -- if I recall, is to
17 review sex offender, their
18 classifications.

19 You know, to also review sex
20 offenders who seek to be removed from
21 the registry. That's like some of --
22 that's like one or two of the duties
23 that the SOR board -- I'm not that
24 familiar with it, because while I was
25 there, it was defunct. You know, it

1 questions.

2 THE WITNESS: I'm sorry.

3 ATTORNEY O'LAUGHLIN: Yes.

4 THE WITNESS: Sorry, sorry,
5 sorry.

6 (BY ATTORNEY O'LAUGHLIN):

7 Q. There's a section at the end
8 that says "Monitoring visits to LSJ
9 when she wasn't there."

10 This section is about what?

11 A. The bullets under here. The
12 first bullet says, "She doesn't recall
13 much." She has to be Attorney Carbon.
14 "She just recalls that Pinney,"
15 myself, "mentioned a question as to
16 whether they had the authority to go
17 past the dock."

18 Okay. So that first bullet.
19 The second one, "She recalls the U.S.
20 Marshals will go out and invite them,
21 because they had the boat. She
22 doesn't recall" a -- "discussions
23 regarding getting a warrant. If there
24 were concerns she'd have passed it on
25 to the AAG, but does not recall" --

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7 Okay. So this section here
8 refers to when we would do our
9 address verifications for all
10 registered offenders here in the
11 Virgin Islands.

17 Okay. So the question was
18 whether or not the dock was
19 Jeffrey Epstein's front door to
20 his home. When we do the address
21 verifications, they are not search
22 warrants.

23 We go, we knock on the door,
24 and we introduce ourselves. We
25 say, "Hello," you know, We're here

1 with the -- "This is DoJ. We're
2 here with the U.S. Marshals here.
3 We're VIPD. And we are here to
4 conduct an address verification."

5 At that point, they can say
6 whether or not we can enter into
7 their home. They have that right
8 to say "no." This question in
9 regards to being able to pass his
10 dock. Because the question came
11 up whether his dock would be his
12 front door.

13 So essentially, if we pull up
14 there, you know, with U.S.
15 Marshals services, with VIPD --
16 and we used to go out on -- if I
17 recall, one time we went on the
18 U.S. Coast Guard boat. Another
19 time we went out on a vessel from
20 DPNR.

21 The question amongst all of
22 the entities was essentially, is
23 this dock his front door? Do we
24 have the legal authority to
25 actually force ourselves past the

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1 dock since he actually owned the
2 island? So that is what that
3 first bullet is referencing.

4 (BY ATTORNEY O'LAUGHLIN):

5 Q. Was that question resolved?

6 A. Was that question resolved?

7 Basically, when -- even when we had a
8 telephone call with our liaisons from
9 USDoJ, they were not able to provide
10 any real guidance on that, because he
11 -- he owned the island.

12 And so, like I said before,
13 when we knock on the door they can say
14 "yes" or "no" you can come in. So we
15 have conducted address verifications
16 in the yard of a sexual offender. It
17 doesn't have to be inside their home.

18 So they were really unsure as
19 to what the laws are. They -- they
20 really were not able to provide any
21 real guidance regarding whether or not
22 Epstein's dock was essentially, you
23 know, representative of his front
24 door.

25 Q. So there was a question, but

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1 DoJ never determined the answer?

2 A. DoJ wasn't able -- was unable
3 to provide guidance. That's correct.
4 No -- no answer was every really
5 received from DoJ about that.

6 Q. Why not?

7 ATTORNEY ACKERMAN: Object to
8 form.

9 THE WITNESS: I'm not sure why
10 not. They weren't sure.

11 (BY ATTORNEY O'LAUGHLIN):

12 Q. And in the absence of guidance
13 from DoJ, how did you approach the
14 question of whether you could go past
15 the dock or not?

16 ATTORNEY ACKERMAN: Object to
17 form. You can answer.

18 THE WITNESS: So, if Epstein
19 was on-island or if his staff
20 allowed us to, that would be when
21 we would go past the dock --

22 (BY ATTORNEY O'LAUGHLIN):

23 Q. Okay.

24 A. -- and actually be on the
25 island, actually on the island

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1 itself.

2 Q. So barring guidance to the
3 contrary, you treated the dock as a
4 front door?

5 ATTORNEY ACKERMAN: Object to
6 form.

7 THE WITNESS: It was agreed
8 amongst the different entities,
9 the U.S. Marshals services, VIPD
10 and also DoJ, that the dock had to
11 be considered as his front door.

12 (BY ATTORNEY O'LAUGHLIN):

13 Q. So it was agreed that that's
14 the way you would all proceed, but
15 there was never a formal decision that
16 that was in fact the right answer;
17 correct?

18 ATTORNEY ACKERMAN: Object to
19 form.

20 THE WITNESS: When you say
21 formal decision, do you mean some
22 -- what do you mean when you say
23 formal decision?

24 (BY ATTORNEY O'LAUGHLIN):

25 Q. Well, you said you never got

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1 the guidance you were looking for. So
2 that's what I mean.

3 A. From USDoJ, no we did not.

4 Q. Okay. But you -- but USVIDoJ
5 did have -- come to a conclusion, even
6 though USDoJ didn't?

7 ATTORNEY ACKERMAN: Object to
8 form.

9 THE WITNESS: Okay. So we
10 concluded that his dock was his
11 front door. That was the
12 conclusion amongst -- jointly
13 amongst all of the entities there
14 that.

15 You know, U.S. Marshals
16 services were not sure, neither
17 was VIPD. So we said, "Okay.

18 Let's consider his dock as his
19 front door."

20 (BY ATTORNEY O'LAUGHLIN):

21 Q. Okay. So USVI Department of
22 Justice did have a view that the dock
23 was the front door. And the thing
24 they were wanting confirmation from
25 was USDoJ. And that's the opinion

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1 they never got?

2 ATTORNEY ACKERMAN: Object to
3 form.

4 THE WITNESS: I wouldn't say
5 that we had that view. If we were
6 able to, we would like to go into
7 the homes of all offenders, you
8 know, to -- because the offender
9 address checks are not warrants.

10 The same way that we would not
11 force ourselves into any offenders
12 home through their front door, we
13 did not want to force our way onto
14 his island pass the dock.

15 So we said we will conduct the
16 checks if they were allowed to
17 come on the island from Epstein or
18 from his employers, his staff, we
19 would go past the dock onto the
20 island.

21 And that will be the same way
22 if any offender, if John Doe on
23 the registry said we can come in,
24 we would come into their home past
25 your front door as well too.

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1 Q. Got it. And USVIDoJ had
2 thought about the question and had
3 determined we're going to treat the
4 dock as his front door for our
5 purposes?

6 ATTORNEY ACKERMAN: Object to
7 form. Asked and answered.

8 Misstates prior testimony. You
9 can answer.

10 THE WITNESS: Yes. So, you
11 know, the -- the sex offender
12 address checks, you know, it was
13 done by U.S. Marshals services,
14 VIPD and DoJ.

15 And it's important to
16 understand also that these address
17 checks are really a function of
18 the U.S. Marshal services. You
19 know, that is something that they
20 receive funding to do throughout
21 the U.S.

22 So they would bring down their
23 team of Marshals from Florida and
24 Georgia, I guess, you know, the
25 Southeast region.

1 So we -- although we were
2 registering the offenders here in
3 the Virgin Islands, we were also
4 taking their lead as to since it
5 was essentially -- I don't want to
6 say their operation.

7 But they received the funding
8 and they would let us know, you
9 know, when the possible dates for
10 the -- we used to refer to them as
11 registration sweeps, you know,
12 when the sweeps could occur.

13 So I also want to highlight
14 that even U.S. Marshals services
15 -- you know, the Marshals, they
16 were also not 100 percent sure as
17 to whether or not we can actually,
18 you know, just go on and pass the
19 dock without the permission.

20 So the -- you know, that
21 guidance, you know, the -- a
22 little bit of unsure from USDoJ
23 as well too. We said, "Okay.
24 That must mean that we have to
25 consider his dock as his front

1 door." Did we want to do it that
2 way? No.

3 You know, we would have loved
4 to. And it was actually, you know
5 -- like I said, we would love to
6 be able to go into the home of
7 every offender, including Epstein,
8 when -- when he was registering.

9 But we came to the -- you
10 know, the decision that his dock
11 had to essentially be considered
12 as his -- as his front door.

13 (BY ATTORNEY O'LAUGHLIN):

14 Q. Why weren't you on the Friday
15 call with Ms. Carbon?

16 A. Oh, I've been on family
17 vacation. I just came back yesterday
18 evening. I've been gone since July
19 5th. So I wasn't available for the
20 call on Friday. Actually Ms. -- the
21 E-mail invite for -- for that
22 meeting.

23 Q. Okay. So you were invited to
24 the meeting by your counsel, but you
25 didn't see the invite, and so didn't

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1 well.

2 Q. Do you recall which of these
3 attorneys were specifically involved
4 with Epstein?

5 ATTORNEY ACKERMAN: Object to
6 form.

7 THE WITNESS: All of the
8 offend -- all of the attorneys
9 assisted with the offenders.

10 Okay. So if I backtrack, I said
11 it would be attorneys specifically
12 will assist with any warrants, any
13 absconders.

14 Epstein didn't have any
15 warrants. You know, he always
16 appeared to register. So there --
17 you know, there were no warrants
18 for him or anything. But in
19 regards to his initial
20 classification, the attorney who
21 dealt with that would have been
22 Attorney Carbon.

23 (BY ATTORNEY O'LAUGHLIN):

24 Q. Okay. And then did the
25 Attorney Generals -- the Attorneys

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1 General themselves get involved in
2 monitoring Epstein at any point?

3 ATTORNEY ACKERMAN: Object to
4 form.

5 THE WITNESS: In monitoring
6 Epstein, no. That -- those were
7 the duties of the coordinators,
8 myself as a manager and also the
9 investigators. So the attorneys
10 were not involved in the
11 monitoring of the offenders.

12 (BY ATTORNEY O'LAUGHLIN):

13 Q. Were they involved in any way
14 with Epstein?

15 ATTORNEY ACKERMAN: Object to
16 form.

17 THE WITNESS: Only in regards
18 to his classification. Epstein
19 was not -- Epstein was never found
20 to be in noncompliance.

21 So there was never a warrant
22 for an attorney to be involved
23 with him in that aspect. With
24 regards to his classification
25 regarding which tier he fell into,

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1 there was -- there was an attorney
2 who dealt with that.

3 (BY ATTORNEY O'LAUGHLIN):

4 Q. So I'm talking specifically
5 about the Attorneys General of the
6 USVI during your time period there.
7 And I'm asking were they involved in
8 any way with Epstein's sex offender
9 registration or monitoring?

10 ATTORNEY ACKERMAN: Object to
11 form.

12 THE WITNESS: In any way --
13 when he first came on, Attorney
14 Carbon, you know, she dealt with
15 him in regards to his
16 classification. Okay?

17 ATTORNEY ACKERMAN: Ms.

18 Pinney, he's asking you about
19 Attorney General --

20 THE WITNESS: Attorneys
21 General.

22 ATTORNEY ACKERMAN: --
23 Attorneys General.

24 THE WITNESS: Okay.

25 ATTORNEY ACKERMAN: Yes.

1 Q. Okay. So let me ask the
2 question this way: If there was a new
3 employee in the group and you had to
4 give them an orientation, you would
5 hand them the statute and say, read
6 this.

7 And then you would describe
8 the practices, but there wasn't a
9 handbook or any other thing you would
10 give them to be like, this is how we
11 do our work.

12 ATTORNEY ACKERMAN: Objection
13 to form, scope.

14 (BY ATTORNEY O'LAUGHLIN):

15 Q. Correct?

16 A. Outside of the statute, there
17 was no other written handbook or
18 policy for employees relative to the
19 sex offender registry.

20 Q. Okay. And you -- so with
21 regard to the practices, you said
22 there was a practice regarding
23 interaction with VIPD; correct?

24 A. Uh-huh.

25 Q. What was that practice?

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1 A. That VIPD will assist the US
2 Marshals Services and VI DoJ with the
3 sex offender registration sweeps.

4 Q. What would you need to do --
5 what would DoJ need to do in order to
6 get that assistance?

7 ATTORNEY ACKERMAN: Object to
8 form, scope.

9 THE WITNESS: The AAG will
10 draft a letter to the head of VIPD
11 requesting assistance.

12 (BY ATTORNEY O'LAUGHLIN):

13 Q. Were there ever times that DoJ
14 would reach out for help with a
15 specific sex offender?

16 ATTORNEY ACKERMAN: Object to
17 form, scope.

18 THE WITNESS: No.

19 (BY ATTORNEY O'LAUGHLIN):

20 Q. So at no point in the time
21 that you were at DoJ did USVI DoJ ever
22 reach out to you US VIPD for
23 assistance with any registered sex
24 offender?

25 ATTORNEY ACKERMAN: Objection,

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1 registered sex offenders and our
2 statutes. Any questions that we may
3 have had, such as what we spoke about;
4 you know, the dock of Epstein.

5 Q. Who at US DoJ would you reach
6 out to with those questions?

7 A. I can't remember the title,
8 but at one point it was Lori
9 McPherson.

10 Q. How many times did you reach
11 out to Lori McPherson regarding
12 Epstein?

13 A. Oh, I -- I cannot recall the
14 amount of times. I -- I can't recall.

15 Q. Were there times?

16 A. The only time I can recall in
17 what would have been in regards to the
18 dock, and that was held when I
19 attended a training for, you know, for
20 -- for -- they had a training for all
21 SORNA, all sex offender registries to
22 attend.

23 And in person when I saw Ms.
24 McPherson, we spoke about, you know,
25 the question regarding Epstein and his

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1 dock.

2 Q. Okay. What did you say to
3 her?

4 A. I explained to her that we
5 were doing the address verifications.
6 And I mean, I can't remember word for
7 word. But all in all, the scope was
8 whether or not we can forcibly come
9 onto the island or you know, is --
10 when I say forcibly, I mean, you know,
11 if we can actually go past the dock
12 and you know, walk on the island until
13 we see, you know, perhaps where he
14 rests. You know, where -- where he
15 lays his head. Or is -- or is there
16 any guidance with regards to offenders
17 who own islands, you know?

18 And the response I got back
19 was that Epstein was unique in that
20 most offenders don't own islands.
21 However, they're -- they drew the
22 comparison to, let's say, an offender
23 lives in the Midwest, you know, where
24 there are, you know, mass amounts of
25 land. You know, and the offender has

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1 a gate, you know, and he owns
2 probably, you know, 20-something ares
3 of land.

4 If his home is within the
5 middle of that, he can argue that his
6 fence is his front door. So, you
7 know, that was the comparison that was
8 -- that was drawn to Epstein.

9 Q. And did they give you that
10 comparison as a means of saying, and
11 we think the dock is the same?

12 ATTORNEY ACKERMAN: Object to
13 form.

14 THE WITNESS: Pretty much, you
15 know, they said that they were not
16 sure. But, you know, they drew
17 that comparison to show that --
18 that essentially, you know, that
19 was how another juris- -- another
20 state had to deal with -- -- with
21 their offender. So yeah, you
22 know, it's -- it's their
23 property.

24 (BY ATTORNEY O'LAUGHLIN):

25 Q. Do you know what Lori

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1 what was said in Brisson's E-mail.

2 Q. What year was that E-mail that
3 you escalated?

4 A. Oh, I don't recall, but I do
5 remember reviewing that document with
6 Attorney Ackerman.

7 Q. Okay. Aside from that one
8 escalation, there were no other
9 escalations by DoJ regarding Epstein;
10 correct?

11 A. Correct. No other, no.

12 Q. Okay. You said that in 2017,
13 your role expanded to include looking
14 at the budget for DoJ; correct?

15 A. Uh-huh.

16 Q. And for the sex offender
17 monitoring group specifically,
18 correct?

19 A. And for the sex -- oh,
20 overseeing the other employees, yes.

21 Q. How is the sex offender
22 monitoring program funded?

23 A. It's a Federally funded
24 program from VI -- from US DoJ and Sex
25 Offender Registry Notification Act.

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1 You know, so by -- by enhancing our
2 laws in 2012, that made us eligible to
3 -- us being the Virgin Islands --
4 eligible to receive funding for
5 employees to -- to monitor offenders
6 in the Virgin Islands.

7 Q. Was that funding adequate to
8 do the job that you guys had to do?

9 ATTORNEY ACKERMAN: Object to
10 form, scope.

11 THE WITNESS: If it was the
12 pos- -- that funding was used for
13 salaries. Other -- and funding
14 was also received from US Marshals
15 Services as well too, you know, to
16 purchase like iPads, you know, for
17 us to use to be able to monitor
18 offenders outside of the office.

19 You know, to be able to update the
20 registry, the online registry
21 outside the office as well too.

22 So from -- from V- -- from US
23 DOJ, that funding was used for
24 salaries, the salaries being, you
25 know, for the three positions.

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1 to form, scope to the extent it's
2 outside the sex offender registry
3 topic.

4 THE WITNESS: To my knowledge,
5 no.

6 (BY ATTORNEY O'LAUGHLIN):

7 Q. Do you know if First Lady
8 Cecile de Jongh ever interacted with
9 DoJ regarding Epstein?

10 A. I cannot say that I was aware
11 of that during my -- during my time.
12 So no.

13 Q. Do you know if Governor de
14 Jongh ever interacted with VI DoJ on
15 behalf of Epstein?

16 A. I --

17 ATTORNEY ACKERMAN: I'm just
18 going to object on scope to this
19 line of questioning. And you can
20 go ahead.

21 THE WITNESS: To my knowledge,
22 no.

23 (BY ATTORNEY O'LAUGHLIN):

24 Q. What about Governor Bryan?

25 A. To my knowledge, no.

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1 THE WITNESS: About the
2 tuition being paid?

3 (BY ATTORNEY O'LAUGHLIN):

4 Q. About the relationship between
5 Governor John de Jongh, the First Lady
6 and Epstein.

7 ATTORNEY ACKERMAN: Objection
8 to form, scope.

9 THE WITNESS: I cannot recall
10 when I was first -- when I became
11 aware of these -- the relationship
12 between Epstein and the former
13 Governor.

14 (BY ATTORNEY O'LAUGHLIN):

15 Q. Did the relationship between
16 Epstein and the de Jongh family ever
17 play any role in DoJ's monitoring of
18 Epstein as a sex offender?

19 A. No.

20 Q. Did either Cecile de Jongh or
21 John de Jongh ever reach out to anyone
22 involved in sex offender monitoring at
23 DoJ regarding Epstein?

24 A. To my knowledge, no.

25 ATTORNEY O'LAUGHLIN: Let's

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1 A. Uh-huh.

2 ATTORNEY ACKERMAN: Same
3 objection, speculation.

4 THE WITNESS: No.

5 (BY ATTORNEY O'LAUGHLIN):

6 Q. Do you agree with the
7 statement that there was no
8 information available to the USVI to
9 trigger an investigation?

10 ATTORNEY ACKERMAN: Objection,
11 scope.

12 THE WITNESS: You're talking
13 about the Attorney General
14 George's statements?

15 (BY ATTORNEY O'LAUGHLIN):

16 Q. Yes.

17 A. Yes, I agree with that.

18 Q. Isn't all of the information
19 that we just looked at information
20 about complaints of criminal activity
21 by Epstein on Little St. James?

22 ATTORNEY ACKERMAN: Objection
23 to form, scope.

24 THE WITNESS: So like what
25 Denise George says here, an

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1 investigation can only be launched
2 if someone launches -- if someone
3 files a criminal Complaint. I'm
4 understanding that to be a
5 Complaint being filed locally, you
6 know, with VI DoJ or you know,
7 with VIPD.

8 (BY ATTORNEY O'LAUGHLIN):

9 Q. Why does it need to be a
10 locally filed Complaint?

11 A. I'm saying that's what I
12 understand and --

13 ATTORNEY ACKERMAN: Hold on.
14 Objection, scope. You can go
15 ahead.

16 THE WITNESS: Yes. I'm saying
17 that's what I understand, you
18 know, the AG's meaning to be here
19 in this sentence. Nothing was
20 ever filed directly with VI DoJ or
21 VIPD to launch an investigation.

22 (BY ATTORNEY O'LAUGHLIN):

23 Q. And DoJ's position is that
24 unless something was filed directly
25 with them, there was no need to do any

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1 kind of investigation into Epstein?

2 ATTORNEY ACKERMAN: Objection
3 to form, scope.

4 THE WITNESS: Yeah. You know,
5 it cannot be a -- no hearsay. It
6 cannot be rumors, whispers. It
7 has to actually be someone
8 actually filing a Complaint.

9 That would have been the
10 means, you know, for any sexual
11 offender to start spark an
12 investigation or you know, if
13 information was shared directly,
14 you know, with the victim you know
15 to VI DoJ. It would have to have
16 been dir- -- it would have had to
17 have been direct communication.

18 (BY ATTORNEY O'LAUGHLIN):

19 Q. Did anyone within DoJ ever
20 push for more to be done with respect
21 to investigating Epstein?

22 ATTORNEY ACKERMAN: Objection
23 to form, scope.

24 THE WITNESS: No.

25 (BY ATTORNEY O'LAUGHLIN):

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1 (BY ATTORNEY O'LAUGHLIN) :

2 Q. No you don't know or you don't
3 think they were?

4 A. If other offenders were
5 granted this, I would have been aware,
6 since I was registering the
7 offenders.

8 Q. Okay. And you're not aware of
9 any other offenders that got these
10 sorts of waivers?

11 A. No.

12 Q. Okay.

13 A. I do want to say though -- you
14 said if they -- if anyone ever made
15 requests. We got complaints all the
16 time, you know.

22 Q. What was the reason for the
23 original regime of having the 21-day
24 notice requirement?

25 ATTORNEY ACKERMAN: Object to

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1 form, scope.

2 THE WITNESS: I am not sure.

3 I don't know. I wasn't involved in

4 the -- in the creation of it.

5 Guidance was received from US DoJ. So

6 that may have been perhaps what US DoJ

7 recommended.

8 However, in the end, even with

9 the changes, US DoJ still approved

10 this SORNA for us to receive the

11 funding for -- we had to receive the

12 funding.

13 (BY ATTORNEY O'LAUGHLIN):

14 Q. Were -- was the 21-day
15 requirement part of what you described
16 as making the laws more strict
17 surrounding the sex offender
18 monitoring?

19 A. I --

20 ATTORNEY ACKERMAN: Object to
21 form. You can answer.

22 THE WITNESS: I assume so.

23 Yes.

24 (BY ATTORNEY O'LAUGHLIN):

25 Q. Okay. And was the requirement

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1 notify via E-mail.

2 (BY ATTORNEY O'LAUGHLIN):

3 Q. Okay. So between the period
4 when Attorney General Vincent Frazer
5 left office and then was replaced by
6 Attorney General -- by acting Attorney
7 General Thomas-Jacobs, you don't
8 recall any particular incidents
9 outside of the ones that you just
10 discussed?

11 A. No, I do not.

12 ATTORNEY O'LAUGHLIN: Okay.

13 So let's enter Tab 12 as Exhibit 20.

14 (Whereupon, Defendant's
15 Exhibit No. 20, 2019 MetaData
16 Documents, was marked for
17 identification)

18 THE WITNESS: And I do also
19 want to add in there, you know, that
20 -- that when I remember more, I think
21 the statute speaks about traveling
22 outside of the United States.

23 So, you know, it was more so
24 like a policy that we have for
25 offenders to notify us of any travel

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1 outside of the Virgin Islands. But
2 the statute really clearly spoke about
3 outside of the United States.

4 And since we are a US
5 territory, you know, travel to Florida
6 or to Minnesota or to New York or New
7 Jersey would have still be considered
8 inside the United States.

9 So we got a policy in place
10 where we wanted the offenders to
11 notify us of, you know, any travel to
12 include outside the territory.

13 (BY ATTORNEY O'LAUGHLIN):

14 Q. So let me see if I understand.
15 Was -- there a change -- was there a
16 change between whether international
17 travel required reporting versus
18 travel within the United States?

19 A. Well, you know, now that we're
20 speaking, and I spoke specifically
21 about the travel to DR, to the
22 Dominican Republic. I'm remembering
23 now that within the statute, it spoke
24 about notifying VI DoJ if any offender
25 has notified any -- of any travel

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1 outside the United States.

2 Q. Okay.

3 A. However, we adopted, you know,
4 a policy, you know, within VI DoJ. We
5 wanted offenders to notify us of any
6 travel outside of the territory as
7 well. So not just outside the United
8 States.

9 So if they were going to
10 Puerto Rico, we wanted to know they
11 were going to Tortola, we wanted to
12 know that as well too.

13 Q. Okay. Was that different from
14 the regime that had been in place
15 before? Like if they had gone to
16 Florida before, would they have needed
17 to notify?

18 ATTORNEY ACKERMAN: Object to
19 form.

20 THE WITNESS: When you say
21 different from before, what time
22 frame? You mean prior to 2012.

23 (BY ATTORNEY O'LAUGHLIN):

24 Q. The -- well, when do you think
25 the change -- if there was a change,

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1 her response was to that I cannot
2 recall.

3 (BY ATTORNEY O'LAUGHLIN) :

4 Q. Okay. So you don't remember
5 what her view was about the previous
6 grants?

7 ATTORNEY ACKERMAN: Object to
8 form.

9 THE WITNESS: No.

10 (BY ATTORNEY O'LAUGHLIN) :

11 Q. Okay. You don't know whether
12 she opposed the grants that Frazer had
13 put in place?

14 ATTORNEY ACKERMAN: Object to
15 form.

16 THE WITNESS: No.

17 (BY ATTORNEY O'LAUGHLIN) :

18 Q. Okay. You talked about
19 sweeps. What is a sweep?

20 A. So the sweep was the name that
21 the US Marshals gave the -- the
22 operation. It was called Operation
23 Island Sweep. And that was when US
24 Marshals Services, they would come in.

25 They would let us know the

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1 dates where we can have this operation
2 to verify the addresses of sex
3 offenders in the Virgin Islands.

4 Q. So the sweeps were run by
5 who?

6 A. Nothing within the statute
7 speaks about sweeps having to occur.
8 So the only thing that is within the
9 statute, if I remember, speaks about
10 an offender moves to the territory
11 within a set amount of dates, VI DoJ
12 officials go out to verify that
13 address.

14 In regards to the sex offender
15 address compliance checks, that was an
16 effort from the US Marshals Services.
17 And if I remember correctly, a part of
18 US DoJ is that the US Marshals
19 Services, that they assist states, you
20 know in the offices who oversee the
21 sexual -- the sex offenders; that they
22 assist them with the operation to
23 include the address verifications.

24 Q. How frequently do sweeps
25 occur?

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1 A. How frequent the sweeps occur?

2 There was no set-in-stone time for the
3 frequency of the sweeps to occur. It
4 would be something where we were in
5 constant communication with the US
6 Marshals Services. And they will let
7 us know, Hey, you know, this will be
8 the time for an upcoming sweep.

9 Q. Do you have an estimate of how
10 frequently they occurred?

11 A. I would say perhaps once a
12 year depending on funding.

13 Q. Okay. Funding from where?

14 A. Funding that the US Marshals
15 Services received. So the US Marshals
16 is Federal funding to conduct the
17 operational sweeps.

18 Q. Okay. And during a sweep,
19 what was the objective?

20 A. The objective was to verify
21 the address of the -- that the sex
22 offender had on record as their
23 permanent residence.

24 Q. What does verify mean?

25 A. Verify, verification process

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1 confirm with Epstein to complete his
2 compliance check within that time
3 period, they would have tried. But
4 once they went back, that was it. You
5 know, the operation ended at that
6 point.

7 Q. And there wouldn't have been
8 any further follow-up, correct?

9 A. Further follow-up in regards
10 to verifying his address?

11 Q. Yeah.

12 A. Well, if we go there and
13 Epstein -- remember I said before
14 another person in the home can, you
15 know, confirm that the offender was
16 living there. Ideally we do want to
17 see the offender in person.

18 However, an offender not being
19 at the address does not -- does not
20 immediately mean that they are in
21 noncompliance or, you know, it -- it
22 wouldn't immediately mean they were in
23 noncompliance if -- within the team if
24 it was agreed that, okay, you know,
25 he's off island right now or, you

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1 know, we can meet him at his office,
2 then that would have been enough to,
3 you know, to -- at the time for, you
4 know, during the week of the checks.

5 Q. You testified earlier that
6 USVI DoJ SOR unit purchased a car?

7 A. Uh-huh.

8 Q. Why?

9 A. I testified earlier that the
10 vehicle was used to conduct the
11 verification checks --

12 Q. So --

13 A. -- the compliance checks.

14 Q. So the car was only used
15 approximately once a year?

16 A. No. Remember I also said
17 that -- that during the year, we would
18 also verify the addresses of
19 offenders, you know, if they
20 relocated, if they had a new address.

21 Within that time, I think it's seven
22 days, that we would also go out to
23 verify their addresses.

24 Q. Were there any other reasons a
25 car would be used?

1 Q. The news articles that we went
2 over earlier today and the 2009
3 article that we looked at -- or sorry,
4 I think it was 2010, July 2010 Daily
5 Beast article with the allegations
6 against Epstein, did any of that
7 reporting cause USVI DoJ to initiate a
8 check on Epstein?

9 ATTORNEY ACKERMAN: Object to
10 form.

11 THE WITNESS: No. Like I
12 stated before, there were no written
13 concrete allegations that were
14 submitted to VI DoJ to constitute, you
15 know, or to elevate for -- for an
16 investigation.

17 And the article was there. I
18 saw the article from The Daily Beast,
19 and yeah, I mean, I remember seeing
20 that here with you, and yeah.

21 (BY ATTORNEY O'LAUGHLIN):

22 Q. That's fine. You don't need
23 to find it.

24 A. I'm not sure how --

25 Q. There was no follow-up here,

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1 already know where Mr. Epstein was
2 living?

3 A. Yes, we did.

4 Q. Okay. Was there any doubt in
5 your mind or in the SORNA unit's mind
6 as to whether Mr. Epstein had moved to
7 a different address?

8 A. No, there was not.

9 Q. Why not?

10 A. Well, for one, he did not
11 provide any notice of change. We
12 received no tips saying that he was no
13 longer living on Little St. James and
14 living at another residence, and yeah.

15 Q. Okay. Was there an instance
16 where Mr. Epstein's verification was
17 conducted at his office?

18 A. Yes, there was.

19 Q. Okay. Did you participate in
20 that verification?

21 A. From my recollection, I did.

22 Q. Okay. And tell me what you
23 recall about that verification when
24 you met Mr. Epstein at his office.

25 A. So we ended up -- when we went

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1 to his island, he wasn't there. So at
2 that point we decided that we can meet
3 him at his -- at his office.

4 When we went to the island,
5 his staff was there, his employees
6 were there. They confirmed, you know,
7 that this was Little St. James and
8 that this was Jeffrey Epstein's, if
9 you want to say his island, you know.

10 And just like how the decision
11 was made in other address checks for
12 other offenders, since he wasn't at
13 home, that was not determined to be
14 that he was in noncompliance. We
15 simply just said, Okay. We'll go to
16 his employer address.

17 Q. Did you verify other sex
18 offenders in the Virgin Islands at
19 their employer's address?

20 A. Yes, we did.

21 Q. Okay. Are the address
22 verifications or the sweeps required
23 by any Virgin Islands statute to your
24 knowledge?

25 A. No.

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1 Q. When you performed the address
2 verifications or the sweeps, do you
3 have a warrant?

4 A. No, we do not.

5 Q. Do you have an understanding
6 as to whether there is any limit on
7 your ability to search or enter a
8 person's, a sex offender's property
9 during an address verification or
10 sweep?

11 A. An address verification does
12 not constitute that VI DoJ has the
13 right to search an offender's home.
14 If we go to the address and we say,
15 Hi, we're here to conduct an address
16 verification, can we come inside, they
17 have the right to say no.

18 Them saying no does not put
19 them in noncompliance because it is
20 not a search warrant. We don't have a
21 search warrant to search the home.

22 So in many instances, we have
23 conducted address -- checks in an
24 offender's yard, on their front porch,
25 and they were found to still be in

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1 compliance because a search of their
2 home was not required to complete that
3 address verification.

4 Q. Okay. Thank you.

5 You testified earlier one of
6 the things you did in preparation for
7 this deposition was to review the
8 testimony of Inais Borque, right?

9 A. Yes.

10 Q. Okay. There was testimony in
11 Ms. Borque's deposition about
12 performing weekly checks of offenders.
13 Do you recall that testimony?

14 A. I do recall reading that in
15 her -- in her deposition, yes.

16 Q. Okay. Was it the practice of
17 the Virgin Islands DoJ SORNA office to
18 conduct weekly checks of sex offenders
19 during the time period that you worked
20 in that office?

21 A. No, it was not.

22 Q. Thank you.

23 I want to go through a few
24 exhibits, and I'll try to just go
25 quickly. But let's start with Exhibit

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1 25, if you would. Do you have Exhibit
2 25 in front of you?

3 A. Yes, I do.

4 Q. Okay. And this is the Virgin
5 Islands daily news article from April
6 3rd, 2018. Do you see that?

7 A. Yes.

8 Q. Okay. And counsel read you a
9 quote that said, "We're not a lenient
10 jurisdiction because we know
11 registration reduces the frequencies
12 of sex offenses against new victims."

13 Did I read that correctly?

14 A. Yes.

15 Q. Did Mr. Epstein ever fail to
16 register in the Virgin Islands?

17 A. No.

18 Q. Okay. We can put that aside.

19 Let's look quickly at Exhibit
20 22. Do you have Exhibit 22 in front
21 of you?

22 A. Yes.

23 Q. Okay. And Exhibit 22 is the
24 E-mail chain with a sex offender. His
25 name is redacted on this document.

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1 had to be creditable, it had to have
2 been a clear indication that the
3 offender was in noncompliance.

4 (BY ATTORNEY ACKERMAN):

5 Q. In your exper- -- given your
6 experience, do you believe news
7 reports would have been sufficient to
8 obtain a warrant to search
9 Mr. Epstein's property?

10 ATTORNEY O'LAUGHLIN:

11 Objection.

12 THE WITNESS: No.

13 (BY ATTORNEY ACKERMAN):

14 Q. Why not?

15 A. The media has a way of
16 sensationalizing a lot of things.
17 That's for one. And it would have to
18 be something that is concrete, that
19 has evidence.

20 It would have to be a victim
21 actually coming forward or a witness
22 actually coming forward and saying,
23 putting it, you know, on record and,
24 you know, a full statement to VI DoJ
25 would have been needed from -- that's

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1 what I think would have been needed to
2 move forward with an investigation
3 against Epstein from VI DoJ.

4 I don't think that a media
5 source of allegations would have been
6 enough for us to go forward to a judge
7 to request an investigation or a
8 warrant to search -- to search the
9 island.

10 Q. During your tenure at the
11 SORNA unit, are you aware of any of
12 Epstein's victims or any witness to
13 Epstein's crimes coming forward to DoJ
14 prior to his arrest?

15 A. No.

16 Q. I want to give you the
17 opportunity to, I think, explain
18 something. You earlier in this
19 deposition used the term real
20 complaints and real victims. Do you
21 recall that phrase?

22 A. I think I was explaining about
23 what -- if allegations were reported
24 to VI DoJ about offenders. Yes, I
25 do.

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1 Q. Yes. Were you meaning to
2 suggest that the victims of
3 Mr. Epstein weren't real?

4 A. Oh, of course not, no. That's
5 not what I meant at all. I was trying
6 to just draw the comparison to show
7 how, you know, a news report of
8 allegations from victims, that was not
9 going -- that was not going to be
10 considered as something concrete.

11 In comparison to other
12 offenders we've had where there have
13 been written allegations, you know,
14 victims coming forward saying that,
15 you know, for example, John Doe on the
16 registry is still committing sexual
17 offenses against children, for
18 example.

19 And with that, that would have
20 been enough proof for us to do an
21 investigation, to contact human
22 services, to contact VIPD as well in
23 those instances. But it was not to
24 say in any way that -- that the
25 allegations from any of those victims,

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1 you know, that they were not real.

2 Q. Thank you.

3 You described earlier a
4 discussion with Denise George
5 concerning Mr. Epstein. Do you recall
6 that testimony?

7 A. Yes.

8 Q. Was that discussion specific
9 to Mr. Epstein or did Mr. Epstein come
10 up in the context of a discussion of
11 sex offenders generally?

12 A. If I recall, he came up in a
13 conversation of sexual -- of sex
14 offenders generally. He came up
15 within the discussion.

16 Q. Thank you.

17 Are you aware whether the
18 Attorney General is involved in
19 monitoring sex -- or strike that. Let
20 me ask the question differently.

21 During your tenure -- tenure
22 at the SORNA unit, was the Attorney
23 General involved directly in
24 monitoring sex offenders?

25 ATTORNEY O'LAUGHLIN:

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1 ATTORNEY O'LAUGHLIN:

2 Objection.

3 THE WITNESS: I'm not sure,
4 but I can say that every jurisdiction
5 has their own set of statutes that
6 they use to determine how frequently
7 or the -- or the duration of time that
8 offenders must appear or how long they
9 have to register.

10 (BY ATTORNEY ACKERMAN):

11 Q. Okay. There was some
12 discussion about the 2012 changes in
13 legislation, the changes in the SORNA
14 legislation, correct?

15 A. Yes.

16 Q. And do you recall testimony
17 about whether drafts of that
18 legislation were shared with
19 Mr. Epstein or his lawyers?

20 A. Yes.

21 Q. Are you aware whether any
22 proposed legislation required approval
23 from the US DoJ?

24 A. It would have had to have been
25 approved by US DoJ. So it was

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1 approved prior to the amendment.
2 After the amendment, it was still
3 approved by VI -- by US DoJ to be in
4 compliance with SORNA.

5 Q. Okay. The proposed
6 legislation, what role did the
7 legislature play in --

8 A. The legis- --

9 Q. -- that process?

10 ATTORNEY O'LAUGHLIN:
11 Objection.

12 THE WITNESS: The role that
13 the legislature played in the -- in
14 the proposed -- the legislature, they
15 had to pass it; you know, they enacted
16 it.

17 (BY ATTORNEY ACKERMAN):

18 Q. Could DoJ have put that
19 legislation in effect by itself?

20 A. No.

21 Q. I want to, if you would, pull
22 out Exhibit 14. Let me know when you
23 have that --

24 A. Okay. I have it.

25 Q. -- in front of you.

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1 A. No.

2 Q. Did the Virgin Department of
3 Justice have access to how often he
4 withdrew cash from his accounts?

5 A. No.

6 Q. Did the Virgin Islands have --
7 Department of Justice have access to
8 the amounts of cash withdrawals that
9 Mr. Epstein made from his accounts?

10 A. No.

11 Q. The Department of Justice
12 couldn't get that information without
13 a -- unless it had a warrant, right?

14 A. I assume that would have --
15 that would be what would have been
16 needed. So yes.

17 ATTORNEY O'LAUGHLIN:

18 Objection.

19 (BY ATTORNEY ACKERMAN):

20 Q. None of that materi- -- none
21 of what I just mentioned is listed on
22 this checklist, is it?

23 A. No.

24 Q. Okay. Ms. Pinney, you were at
25 the SORNA unit for close to ten years;

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1 is that right?

2 A. Yes.

3 Q. Did you do everything in your
4 power to appropriately monitor
5 Mr. Epstein?

6 A. Absolutely, yes.

7 Q. Do you believe that the SORNA
8 unit is responsible for Mr. Epstein's
9 crimes?

10 A. No.

11 Q. If you had any information
12 that Mr. Epstein was committing crimes
13 on his island, what would you have
14 done?

15 A. I would have reported that
16 information to our investigator,
17 VIPD, criminal, the AG.

18 Q. Did you ever participate in a
19 cover-up of Mr. Epstein's crimes?

20 A. Absolutely not. No.

21 MR. ACKERMAN: I have nothing
22 further.

23 REDIRECT EXAMINATION

24 (BY ATTORNEY O'LAUGHLIN):

25 Q. Ms. Pinney, counsel for USVI